

1 MICHELE C. BARNES (SBN 187239)  
michele.barnes@klgates.com  
2 PETER E. SOSKIN (SBN 280347)  
peter.soskin@klgates.com  
3 K&L GATES LLP  
Four Embarcadero Center  
4 Suite 1200  
San Francisco, CA 94111  
5 Telephone: +1 415 882 8200  
Facsimile: +1 415 882 8220  
6  
7 Attorneys for Defendant  
CRANE CO.

8  
9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION  
12

13 PATRICIA J. COVEY-HINZO, individually  
and as successor in interest to GILBERT E.  
14 HINZO, Deceased, ALEX HINZO, an  
individual, and FELICIA WATSON, an  
15 individual,

16 Plaintiffs,

17 v.

18 ASBESTOS DEFENDANTS et al.

19 Defendants  
20

Case No. C 15-00241 WHA (Lead Case)

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER TO CONTINUE EXPERT REPORT  
DEADLINES**

21 WHEREAS, the Court's March 27, 2015 Scheduling Order provides for a briefing schedule  
22 on expert reports as follows:

23 1. The last date for designation of expert testimony and disclosure of full expert reports  
24 under FRCP 26(a)(2) as to any issue on which a party has the burden of proof ("opening reports")  
25 shall be DECEMBER 18, 2015.

26 2. Within **FOURTEEN CALENDAR DAYS** of said deadline, all other parties must disclose  
27 any expert reports on the same issue ("opposition reports")

28 3. Within **SEVEN CALENDAR DAYS** thereafter, the party with the burden of proof must

disclose any reply reports rebutting specific material in opposition reports (“rebuttal reports”).

4. The cutoff for all expert discovery shall be FOURTEEN CALENDAR DAYS after the deadline for reply reports.

WHEREAS, pursuant to the Court’s March 27, 2015 scheduling order, non-expert discovery closes on December 18, 2015;

WHEREAS, Plaintiffs first identified the only known witness with information about Decedent’s work history on November 12, 2015;

WHEREAS, the deposition of this witness has been noticed for December 8, 2015;

WHEREAS, the parties have agreed that the late timing of the disclosures of the only potential product identification witness will make it impracticable for the parties to adhere to the Court’s expert report deadlines.

IT IS HEREBY STIPULATED AND AGREED that the deadline for designation of expert testimony and disclosure of full expert reports under FRCP 26(a)(2) as to any issue on which a party has the burden of proof (“opening reports”) shall be continued to January 7, 2015. All other deadlines in the Court’s scheduling order shall remain in place.

**K&L Gates LLP**

Dated: November 25, 2015

By: /s/ Peter E. Soskin  
Peter E. Soskin  
Attorneys for Defendant Crane Co.

**HUGO PARKER LLP**

Dated: November 25, 2015

By: /s/ Lisa Rickenbacher  
Lisa Rickenbacher  
Attorneys for Defendant General Dynamics Corporation

**Armstrong & Associates, LLP**

Dated: November 25, 2015

By: /s/ William Armstrong  
William Armstrong  
Attorneys for Defendant  
Crown Cork & Seal Company, Inc. and  
Crown Holdings, Inc.

**Nixon & Peabody LLP**

Dated: November 25, 2015

By: /s/ Lauren Michals  
Lauren Michals  
Attorneys for Defendant  
Harsco Corporation

**Leader & Berkon LLP**

Dated: November 25, 2015

By: /s/ Bobbie Rae Bailey  
Bobbie Rae Bailey  
Attorneys for Defendant  
IMO Industries, Inc.

**Prindle, Amaro, Goetz, Hillyard,  
Barnes & Reinholz LLP**

Dated: November 25, 2015

By: /s/ Carla Lynn Crochet  
Carla Lynn Crochet  
Attorneys for Defendants  
Ingersoll Rand Company and  
Syd Carpenter, Marine Contractor, Inc.

**Morgan Lewis & Bockius LLP**

Dated: November 25, 2015

By: /s/ Joseph Duffy  
Joseph Duffy  
Attorneys for Defendant  
ITT Corporation

**McKenna, Long & Aldridge**

Dated: November 25, 2015

By: /s/ Lisa Oberg  
Lisa Oberg  
Attorneys for Defendant  
Metalclad Insulation LLC

**Steptoe and Johnson LLP**

Dated: November 25, 2015

By: /s/ Lisa Marie Dowling  
Lisa Marie Dowling  
Attorneys for Defendant  
Metropolitan Life Insurance Company

**The Davis Law Firm**

Dated: November 25, 2015

By: /s/ Whitney Davis  
Whitney Davis  
Attorneys for Defendant  
Viad Corporation

**Tucker Ellis LLP**

Dated: November 25, 2015

By: /s/ James Cunningham  
James Cunningham  
Attorneys for Defendant  
Warren Pumps, LLC

**Pond North LLP**

Dated: November 25, 2015

By: /s/ Frank Pond  
Frank Pond  
Attorneys for Defendants  
CBS Corporation, a Delaware corporation  
f/k/a/ Viacom, Inc., successor by merger to  
CBS Corporation, a Pennsylvania  
corporation, f/k/a Westinghouse Electric  
Corporation; and FMC Corporation on behalf  
of its former Northern Pump business

**Heard Robins Cloud LLP**


Dated: November 25, 2015

By: /s/ Sara Morton  
Sara Morton  
Attorneys for Plaintiffs

1        **PURSUANT TO STIPULATION**, the deadline for designation of expert testimony and  
2 disclosure of full expert reports under FRCP 26(a)(2) as to any issue on which a party has the burden  
3 of proof ("opening reports") shall be continued to January 7, 2015. All other deadlines in this Court's  
4 scheduling order shall remain in place.

5        **IT IS SO ORDERED.**

6  
7 Dated: November 30, 2015.

  
8 Honorable William Alsup  
9 Judge, United States District Court  
Northern District of California